

LAW OFFICE OF IRENE KARBELASHVILI

Irene Karbelashvili, State Bar Number 232223

Irakli Karbelashvili, State Bar Number 302971

12 South First Street, Suite 413

San Jose, CA 95113

Telephone: (408) 295-0137

Fax: (408) 295-0142

Attorneys for RACHELLE RIDOLA, Plaintiff

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

_____)	Case No. 16-cv-1351-BLF
RACHELLE RIDOLA,)	
Plaintiff,)	STIPULATION FOR DISMISSAL OF
)	ACTION WITH PREJUDICE AND
vs.)	[PROPOSED] ORDER
)	
E-Z8 MOTELS, INC., a California)	
corporation, d/b/a E-Z8 MOTEL SAN)	
JOSE I; UB PROPERTIES SERIES 3,)	
LLC, a California limited liability)	
company; and DOES 1-10, inclusive,)	
Defendants.)	

STIPULATION

Plaintiff RACHELLE RIDOLA (“Plaintiff”) and Defendants E-Z8 MOTELS, INC., a California corporation, d/b/a E-Z8 MOTEL SAN JOSE I; and UB PROPERTIES SERIES 3, LLC, a California limited liability company (collectively “Defendants”), by and through their respective attorneys of record, stipulate as follows:

1. Plaintiff’s complaint in the above-entitled action shall be dismissed with prejudice against Defendants pursuant to F.R.C.P. 41(a).
2. The Court will retain jurisdiction to enforce the terms of the parties SETTLEMENT AGREEMENT AND RELEASE.
3. All parties shall bear their own attorney fees and costs in the action.

Date: January 10, 2017

By: /s/Irakli Karbelashvili
IRAKLI KARBELASHVILI
Attorney for Plaintiff RACHELLE RIDOLA

Date: January 10, 2017

By: /s/ Robert M. Shaughnessy,
ROBERT M. SHAUGHNESSY
Attorney for Defendants E-Z8 MOTELS, INC.; and
UB PROPERTIES SERIES 3, LLC

FILER’S ATTESTATION

I hereby attest that on January 10, 2017, I, Irakli Karbelashvili, received the concurrence of Defendants’ counsel in filing of this document.


/s/ Irakli Karbelashvili
IRAKLI KARBELASHVILI

~~[PROPOSED]~~ ORDER

Having reviewed the above stipulation for dismissal by Plaintiff RACHELLE RIDOLA on the one hand and Defendants E-Z8 MOTELS, INC., a California corporation, d/b/a E-Z8 MOTEL SAN JOSE I; and UB PROPERTIES SERIES 3, LLC, a California limited liability company on the other hand, IT IS HEREBY ORDERED that:

1. This action is dismissed with prejudice against all Defendants.
2. The Court will retain jurisdiction to enforce the terms of the parties' SETTLEMENT AGREEMENT AND RELEASE.
3. All parties shall bear their own attorney fees and costs in the action.
4. The court clerk shall close the case file.

Dated: Jan 12, 2017


United States District Judge